

Committing

Innovating

Acting

Uniting

Ethics and CSR Charter



Cyrille Bolloré
Chairman and
Chief Executive Officer

Message from the Chairman

“Grounded in durability, pragmatism and diversity, and deeply rooted in all the local communities where it operates, from the start our Group has been working to create...

... innovative services and solutions with a long-term, internationally minded vision. Drawing on strong values, **boldness, humility, solidarity and excellence**, our Group, which will soon celebrate its 200th birthday, devotes its ethics policy and commitment to a corporate social responsibility that lies at the heart of its strategy and corporate culture.

The sincerity of the commitments expressed in this Ethics and CSR Charter is based on our familiarity with the terrain and the long view that characterize our journey together. We are keenly aware of both our responsibility and the operating constraints we must confront.

We are also aware of the monumental governance challenges that can be a barrier to the most fundamental human rights and environmental

protection in many of the countries where we do business. The Bolloré Group is not committing to these issues to follow a trend, but rather so it can best prevent and mitigate the risks related to our activities and generate positive social and environmental impacts that benefit all our stakeholders.

The implementation of this Ethics and CSR Charter renewing our commitments is a responsibility borne by each and every one of us. Both our reputation and prosperity are at stake, and I am confident that I can count on all the people who invigorate our Group every day to take on these challenges.

”

Cyrille Bolloré, 2020.

Preamble

Present in more than 100 countries, its strategy of continual innovation, its capacity to adapt and diversify, and its drive to expand internationally, has allowed the Bolloré Group to hold strong positions in its three lines of business: **transportation and logistics, communications, and electricity storage and systems solutions.**

In a dramatically shifting business environment, the Bolloré Group is asserting its determination to respond to the ethical, social and environmental challenges that affect the prosperity of its activities. The company believes that the preference criteria of its customers and investors, as well as its teams' pride in belonging to it and the trust of all its stakeholders, will be based increasingly on its non-financial performance.

This **Ethics and CSR Charter** sets out the Group's major commitments in support of a sustainable and inclusive development. The relevance of its responses to these complex challenges, tailored to the circumstances in which the Group operates, will be based on the **gradual implementation of vigilance cycles capable of demonstrating the sensibility and effectiveness of its actions.**

In addition to compliance with the regulatory requirements, the standard framework that guides this Ethics and CSR policy incorporates **the principles of the International Charter of Human Rights, the guiding principles issued by the UN, OECD and ILO, the guiding principles of ISO 26000, the principles of the Global Compact and Sustainable Development Goals of the United Nations.**

The Group thus intends to **utilize all the appropriate resources** to ensure compliance with these commitments based on a vigilance culture, aiming to be shared with all the stakeholders. As such, **this charter, which is being made available to the public by every appropriate means, is an integral part of the rules that govern our business relationships.**

The commitments described here unite the employees of the different entities and enable them not only to safeguard but also perform their duties with full awareness of their rights and obligations to the Bolloré Group and to its stakeholders.

Shared commitments

Through this charter,
the Bolloré Group undertakes to:

- ➔ **identify**, prevent and mitigate the social and environmental risks its activities may expose the stakeholders of its value chains to, by implementing robust vigilance cycles;
- ➔ **roll out** all the appropriate resources to effectively manage the most important risks related to its activities, and to optimize its actions as it continually strives to make positive economic, social, ethical and environmental impacts;
- ➔ **incorporate** the commitments of this charter into its specific policies, guiding its teams and partners in their day-to-day actions in all the countries where it operates;
- ➔ **consult** with and take into consideration the expectations of its relevant stakeholders, ensure that whistleblowers are carefully listened to and properly protected;
- ➔ **share** the results of the policies implemented as part of the proper reporting of non-financial information (in the context of the Statement on non-financial performance).

4 strategic axes

This Ethics and CSR Charter articulates the Bolloré Group's commitments, which break down into four strategic focuses:



Uniting
and protecting
people, the company's
greatest strength



Acting
with integrity in
our business conduct
and promoting
human rights



Innovating
in response to major
environmental challenges



Committing
over the long-term
to regional development

Uniting

and protecting people,
the company's greatest strength



The extent to which all our employees thrive is directly connected to the Bolloré Group's success: their commitment and skills are pivotal to the company's performance. The Group positions itself as a leading employer by attracting talents that share its values.

The Bolloré Group undertakes to:

- promote ongoing, first-rate social dialog with its employees;
- encourage the development of all its employees and the enhancement of their employability;
- guarantee its employees a healthy and safe working environment;
- enforce an equitable and motivating compensation policy in line with the results of the divisions and local economic contexts;
- enforce an effective social welfare policy;
- guarantee the implementation of a recruitment and development process that promotes equal opportunities, diversity and inclusion.

To learn more about the Bolloré Group's commitments to combat discrimination, see the [Group Diversity and Inclusion Charter](#).



Acting

with integrity in our business
conduct and promoting
human rights



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New regulatory and societal expectations have led the Group to phase in due diligence processes, in all its operations and as part of its business relationships. The Group is thus committed to an ethics policy based on commitments shared by all its subsidiaries, and it makes every effort to institute a framework that guarantees ethical practices that respect human rights in its business conduct.

As part of its compliance policy, the Bolloré Group:

- forbids influence peddling, corruption and any behavior consisting of offering, requesting or granting illicit undue benefits and/or payments to obtain and/or retain a contract, or any other illegal benefit;
- forbids anti-competitive practices;
- ensures compliance with economic sanction plans;
- combats tax evasion;
- maintains relationships with authorities that comply with its ethics policy;
- publishes clear, specific information;
- reports the measures implemented to ensure the compliance of its commitments.

As part of its vigilance policy, the Bolloré Group undertakes to:

- ensure respect for workers' rights across its value chain, complying with the highest standards promoted by the international organizations;
- respect the fundamental rights of the communities and residents where it conducts business;
- identify and prevent damage to the environment, human rights and the health and safety of people;
- combat all forms of harassment and discrimination;
- continually strive to make a positive societal contribution for its stakeholders;
- ensure compliance with its commitments in its supply chain through the implementation of suitable vigilance processes;
- educate its employees about these issues.

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To learn more about the Group's Human Rights commitments, see the [Group Human Rights Charter](#).



These commitments are set down in the **Bolloré Group's Code of conduct**, which requires all its agents, employees and trading partners to act with integrity in all circumstances in order to safeguard the Group's reputation.

The Group encourages its stakeholders to report any breach through the procedure in place for this purpose: alert.bolloré.com.

Innovating

in response to major
environmental challenges



In order to anticipate major societal changes and support the adaptations necessary for sustainable development, such as energy transition, the reduction of the environmental footprint of human activities or the consideration of climate issues, the Bolloré Group is deploying mitigation measures and investing in the long term in order to offer innovative and connected low-carbon products and services.

With the aim of harmonising its products and services towards environmental protection, the Bolloré Group undertakes to:

- engage in every effort for the preservation of the environment;
- monitor its environmental impact by measuring its consumption of natural resources and its emissions in order to implement strategies to limit its negative impacts;
- incorporate environmental issues and climate concerns into its investment strategy;
- implement measures to reduce and offset the negative impacts of its activities on the environment;
- be a committed player when it comes to the energy transition and promote energy efficiency and the use of renewable energies;
- develop inventive logistics solutions for increasingly tenable business activities as part of a continued improvement approach;
- promote the efficient use of natural resources;
- implement measures to preserve and protect biodiversity;
- enhance communication and cooperation with stakeholders on environmental topics;
- encourage and welcome any verification certifying that its environmental commitments are being met.



Committing

over the long-term
to regional development



As a major global economic actor, the Group takes a proactive approach when it comes to access to education, training and medical attention, the establishment of enduring partnerships on issues that connect to its activities or values, by forging synergies with the local actors of the regions where it operates.

Owing to its strong territorial grid, and as a player in economic and social development, the Bolloré Group is committed to :

- ➔ encourage the hiring of local employees;
- ➔ contribute to the training and skills development of local communities where we operate;
- ➔ contribute to the opening-up of regions by offering infrastructure investments and through logistics and transport solutions;
- ➔ invest in the local economy;
- ➔ identify its stakeholders and create quality dialog;
- ➔ develop local partnerships in order to contribute to local development;
- ➔ commit to social and societal actions that benefit people;
- ➔ support community initiatives through sponsorship actions.

To learn more about the Group's societal commitments, click here :
<https://www.deuxiemechance.org/>
<https://www.earthtalent.net/en/>
<https://www.foyerjeanbosco.com/>



Scope

The provisions of this charter replace the 2012 Ethics and Values Charter and are enforced across the Bolloré Group and all the subsidiary companies in which it is the majority shareholder within the meaning of French law, and among all employees of the subsidiaries.

The proper implementation of **the Ethics and CSR Charter** in all the Group's entities is monitored by a governance body, **the Ethics-CSR and Anti-corruption Committee**, and an operational department, **the CSR Department**.

→ The Committee is chaired by a member of the Group's executive management and consists of the Chief Executive Officers of the divisions, and the heads of the Finance, Human Resources, Legal Affairs, Management Control, Compliance, Investor Relations, Communications and CSR departments. Its aim is to establish the Group's strategic focuses. The task of the divisions is to enact action plans that respond to these focuses, to which may be added priorities that especially suit the particular activities and regions.

→ The Group CSR Department is led by the Communications and CSR Department, which reports to the Group's Vice-Chairman, who is also the Chief Financial Officer and a Director of Bolloré SE. The Group CSR team relies on the divisions and their network of CSR representatives to enact the Group's CSR strategy within each entity.

This Ethics and CSR Charter is a foundation of the Bolloré Group's policy, and is supplemented by its general Code of conduct, which is signed by its employees, and the delineation of topic-specific policies, procedures and action plans.

→ Each Group entity shall ensure that all of its employees review these commitments through the appropriate channels. **This charter does not replace the legal provisions but rather is intended to supplement them, without being exhaustive.** It is shared with anyone who belongs to the Group, as soon as (s)he is hired, and is made available to the public through all appropriate means, and is an integral part of the rules governing our business relationships.

To learn more, consult the [Group Responsible Purchasing Charter](#).



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